Dear Federal Communications Commission:

Pursuant to the FCC's Public Notice DA 25-219 released on March 12, 2025, which invites public comment on eliminating or modifying outdated or unnecessarily burdensome regulations, I respectfully submit the following recommendation:

Recommendation

It is respectfully recommended that the FCC consider adopting the IEC 62209-3 “fast SAR” test method as an accepted compliance option for Specific Absorption Rate (SAR) certification testing of portable wireless devices.

Rationale

Internationally Recognized
IEC 62209-3 standard represents an internationally accepted approach to SAR assessment, employing faster, more efficient scanning techniques without compromising measurement accuracy. Notably, EU (European Union) has already accepted fast SAR as part of CE compliance certification, demonstrating the method's reliability and global acceptance.

Significant Efficiency Gains
Compared to traditional full SAR testing, the fast SAR method substantially reduces testing time—often from hours to under 30 minutes—leading to lower testing costs and faster product certification cycles. This efficiency is especially valuable for small and medium-sized enterprises, which face disproportionate regulatory burdens under current methods.

Alignment with FCC’s Deregulatory Objectives
As stated in DA 25-219, the Commission seeks to eliminate outdated rules that may hinder technological advancement and impose unnecessary burdens. Adoption of the fast SAR method would reflect technological progress and support the deployment of new, innovative wireless devices by reducing certification barriers.

Conclusion and Call to Action

In alignment with the Commission’s objectives to promote innovation, streamline regulatory processes, and improve certification efficiency, I respectfully recommend that the FCC:

- Formally acknowledge the IEC 62209-3 fast SAR method as an acceptable option for demonstrating SAR compliance;

- Request the Office of Engineering and Technology (OET) to assess this method and, where appropriate, publish relevant guidance or a Knowledge Database (KDB) entry to support its practical implementation;

- Encourage test laboratories to adopt fast SAR procedures when applicable, in order to accelerate device approval timelines without compromising safety or technical integrity.

Sincerely
Dao Kang